

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

BROC HUNNELL	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.:
	)	
NATIONAL HEALTHCARE	)	
COLLECTIONS, LLC	)	<b>JURY TRIAL DEMANDED</b>
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant National Healthcare Collections, LLC (“NHC”) hereby removes this action from the 11<sup>th</sup> Judicial Circuit, St. Charles County, Missouri. As grounds for removal, NHC states as follows:

1. On October 18, 2012, Plaintiff filed a lawsuit captioned Broc Hunnell v. National Healthcare Collections, LLC, Case No. 1211-AC07546, in the 11<sup>th</sup> Judicial Circuit, St. Charles County, Missouri (the “State court action”). A true and correct copy of the Petition filed in the State court action and Associate Division Summons (“Summons”) issued in the State court action are attached hereto as **Exhibit A**.

2. NHC was served a copy of the Petition and Summons on or after October 22, 2012. As is required by 28 U.S.C. § 1446(b), this Notice of Removal is filed within 30 days of service on NHC of the “Notice and Summons” and Plaintiff’s initial pleading.

3. In accordance with 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders served upon NHC in the State court action are attached hereto at **Exhibit A**.

4. Any civil action filed in a State court over which the federal district courts would have original jurisdiction may be removed. 28 U.S.C. § 1441(a).

5. The above-captioned case is removable because this Court has original subject matter jurisdiction on federal question grounds pursuant to 28 U.S.C. § 1331.

6. As is stated in Plaintiff's Petition, this case arises under federal law -- more particularly under the Fair Debt Collections Practices Act, 15 U.S.C. § 1692 et. seq.

7. Accordingly, this case can be properly removed to this Court pursuant to 28 U.S.C. § 1331 because federal question jurisdiction exists.

8. Under the provisions of 28 U.S.C. § 1441(a), the United States District Court for the Eastern District of Missouri is the federal court for the district and division embracing the place where the State court action is pending (*i.e.*, St. Charles County, Missouri).

9. NHC has complied with all applicable requirements of 28 U.S.C. § 1446 for removing this action, including giving written notice of the filing of this Notice of Removal to Plaintiff and filing a copy of the Notice of Removal with the clerk of the 11<sup>th</sup> Judicial Circuit, St. Charles County, Missouri.

WHEREFORE, Defendant NHC gives notice that this action is hereby removed from the 11<sup>th</sup> Judicial Circuit Court, St. Charles County, Missouri, to the United States District Court for the Eastern District of Missouri.

Respectfully Submitted,

HUSCH BLACKWELL LLP

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 20, 2012, the foregoing was filed electronically with the Clerk of the Court and served by operation of the Court's electronic filing system, and U.S. First Class Mail postage prepaid, to the following counsel of record:

Richard Anthony Voytas, Jr.  
James W. Eason  
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St. Louis, MO 63108

*Attorneys for Plaintiff*

/s/ Nathan D. Sturycz